

Serial No. **10/717,668**  
Amdt. dated March 27, 2006  
Reply to Office Action of October 26, 2005

Docket No. **K-0558**

### **REMARKS/ARGUMENTS**

Claims 1-38 are pending in this application. By this Amendment, the Abstract, specification, and claims 1-7, 9-18 and 20-23 are amended, and claims 24-38 are added. The Abstract and specification are amended for clarification purposes only. No new matter is added. Support for the claims can be found throughout the specification, including the original claims and the drawings. Withdrawal of the rejections in view of the above amendments and the following remarks is respectfully requested.

#### **I. Informalities**

The Office Action objects to the disclosure due to informalities. It is respectfully submitted that the amendments to the specification submitted herewith are responsive to the Examiner's comments, and thus the objection should be withdrawn.

#### **II. Rejection Under 35 U.S.C. §102(b)**

The Office Action rejects claims 1, 5-15 and 18-23 under 35 U.S.C. §102(b) over U.S. Patent No. 6,167,733 to Lee (hereinafter "Lee"). The rejection is respectfully traversed.

Independent claim 1 recites a filter provided in the filter case, the filter comprising a shaft with a plate disposed at one end thereof and in opposition to the passage so as to prevent a particle from passing through the passage, wherein the filter is configured to gather particles in a central portion thereof in response to a centrifugal force generated when fluid flows into the filter case through the inlet and generates a circular flow within the body as it whirls towards the

passage. Lee neither discloses nor suggests at least such features, or the claimed combination of features.

Lee discloses a pump 350 for a washing machine which includes an integrally formed filter 340. The pump 350 includes a rectangular casing 351, with the filter 340 extending through a hole 342 in the casing 351 and into a single chamber defined by outer walls of the casing 351. The filter 340 includes a cap 344 which is fitted across the hole 342, and a mesh plate 346 extending into the single chamber from the cap 344. The mesh plate 346 includes a plurality of pores 346a for filtering out impurities from incoming wash water. First, second and third ports 348, 354 and 356, respectively, and an impeller 358 are provided in the casing 351 as shown in Figure 4 of Lee. Used wash water flows through the first port 348, which is specifically aligned with the mesh plate 346, and into the chamber, where it is filtered by the mesh plate 346 and either re-circulated through the second port 354 or drained through the third port 356 based on a positioning of a pair of valves 355 and 357 and a rotational direction of the impeller 358.

The filter 340 is simply a flat mesh plate 346 which extends from the cap 344. Lee neither discloses nor suggests that the filter comprises a shaft, let alone a shaft with a plate disposed at one end thereof and in opposition to a passage formed in the case, as recited in independent claim 1. Further, Lee discloses that the first port 348 is specifically aligned with the mesh plate 346 to filter impurities from the wash water as it enters the case. The filtered water

then flows either towards the second port 354 or the third port 356, thus forming a fork, or a Y shaped flow. Lee neither discloses that the filter 340 is configured to gather particles in a central portion thereof in response to a centrifugal force generated when fluid flows into the case, as recited in independent claim 1, nor that any type of circular flow is generated within the body as fluid whirls towards a passage, as recited in independent claim 1.

Accordingly, it is respectfully submitted that independent claim 1 is not anticipated by Lee, and thus the rejection of independent claim 1 under 35 U.S.C. §102(b) over Lee should be withdrawn. Dependent claims 5-14 are allowable at least for the reasons set forth above with respect to independent claim 1, from which they depend, as well as for their added features.

Independent claim 15 recites a filter case, comprising, *inter alia*, a partition wall provided in the tube and configured to partition an internal space of the tube into a first chamber in communication with the inlet, and a second chamber in communication with the outlet; and an opening extending through the partition wall. Independent claim 15 further recites a filter comprising, *inter alia*, a shaft extending from the cap toward the opening; and a plate provided at an end of the shaft and positioned facing the opening in the partition wall with a predetermined gap formed between the plate and the partition wall, wherein the plate is configured. Independent claim 15 also recites that the filter is configured to gather particles in a central area thereof in response to a centrifugal force generated when fluid whirls through the first chamber

towards the opening. As set forth above, Lee neither discloses nor suggests such at least such features, or the claimed combination of features.

More specifically, the case 351 disclosed by Lee defines a single chamber into which the three ports 348, 354, 356 feed into and out of, and in which both the filter and impeller are provided. Lee neither discloses nor suggests any type of partition wall positioned within the case, let alone a partition wall which partitions an internal space into a first chamber and a second chamber, as recited in independent claim 15. Further, as set forth above, Lee neither discloses nor suggests that the filter includes a shaft and plate as recited in independent claim 15, nor that particles are gathered on the filter in response to a centrifugal force generated as fluid whirls toward a passage formed between the chambers, as recited in independent claim 15.

Accordingly, it is respectfully submitted that independent claim 15 is not anticipated by Lee, and thus the rejection of independent claim 15 under 35 U.S.C. §102(b) over Lee should be withdrawn. Dependent claims 18-23 are allowable at least for the reasons set forth above with respect to independent claim 15, from which they depend, as well as for their added features.

### **III. Rejection Under 35 U.S.C. §103(a)**

The Office Action rejects claims 2-4, 16 and 17 under 35 U.S.C. §103(a) over Lee. The rejection is respectfully traversed.

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Dependent claims 2-4, 16 and 17 are allowable over Lee at least for the reasons set forth above with respect to independent claims 1 and 15, from which they respectively depend, as well as for their added features.

#### **IV. New Claims 24-38**

New claims 24-38 are added to the application. It is respectfully submitted that new claims 24-38 meet the requirements of 35 U.S.C. §112, and that new claims 24-32 are allowable at least for the reasons set forth above with respect to independent claims 1 and 15, from which they respectively depend, as well as for their added features. It is further submitted that new claims 33-38 also define over the applied prior art.

#### **V. Conclusion**

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned, **JOANNA K. MASON**, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this,

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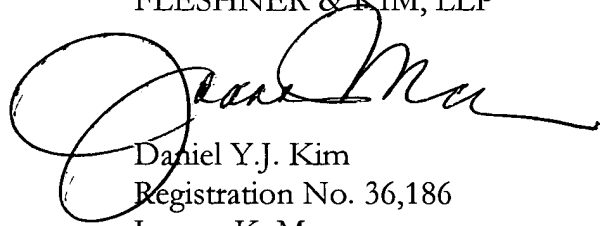
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concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
FLESHNER & KIM, LLP

A handwritten signature in black ink, appearing to read 'Daniel Y.J. Kim', written over the printed name and registration number.

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